

September 8, 2016

REDACTED VERSION

Mr. Gary Fulton, Administrator
Louisiana Department of Environmental Quality
Office of Environmental Compliance
Remediation and Underground Storage Tank Division
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312

Re: Workplan – Soil Sampling and Analysis
Lard Oil Company, Inc.
Denham Springs Facility
914 Florida Avenue SW
Denham Springs, Louisiana
Livingston Parish
LDEQ Agency Interest No. 32468
SPOC Confirmation No. Y0IF 15813
PPM Project No. 542321

Dear Mr. Fulton:

PPM Consultants, Inc. (PPM), as environmental consultant for Lard Oil Company, Inc. (Lard Oil), herein submits a Workplan for the collection and analysis of surface soil samples from residential properties located in and around the above-referenced facility. Soil samples will be collected from those residential properties where there was visible oil stained vegetation, grass, and/or soil. The location of the Lard Oil Denham Springs Facility is shown in **Figure 1, Site Location Map, in Attachment A, Figures**. The locations of residential properties with respect to the Lard Oil Denham Springs Facility are shown in **Figure 2, Site Map, in Attachment A**.

1.0 BACKGROUND

As a result of record rainfall, extensive flooding began at the above-referenced facility on or about August 13, 2016. Due to the flooding, Lard Oil was unable to return to the facility until August 19, 2016, at which time it was discovered that a release had occurred from the facility and had migrated off the facility via floodwaters. The National Response Center, Louisiana Department of Environmental Quality (LDEQ), and Louisiana State Police (LSP) were notified of the release on August 19, 2016, when Lard Oil became

aware of the event. Based on currently available information, Lard Oil estimates that approximately 300 to 600 gallons of new motor oil and 451 gallons of diesel exhaust fluid released from the facility.

Prior to mobilization to the area, PPM contacted the property owners within the residential neighborhood and obtained an access agreement to perform an initial site assessment of the property, take photographs, and collect any other pertinent information pertaining to the property. PPM has conducted site assessments of several residential properties and performed cleanup activities (cut grass, trimmed shrubs, pressure washed structures, pressure washed chain-linked fences, and removed wooden fences) within the residential neighborhood. A list indicating PPM possession of access agreements with property owners is provided in **Attachment B, Access Agreements**.

2.0 SCOPE OF WORK

The scope of work to perform soil sampling activities at the site will be conducted in accordance with LDEQ Risk Evaluation / Corrective Action Program (RECAP), Appendix B, October 20, 2003, and will consist of the following:

- Perform pre-field implementation activities, including preparation of a site-specific Health and Safety Plan (HASP); conduct a site visit to identify overhead utilities and proposed soil boring locations; and contact Louisiana One Call to locate underground utilities a minimum of three (3) days prior to implementation of the field work.
- Install soil borings (maximum of four borings per property) to a maximum depth of approximately 2 feet below ground surface (BGS) using hand equipment. Soil cuttings generated during the installation of the soil borings will be containerized pending proper disposal. Samples will be collected from the following areas where impact is suspected:
 - Soil sample beneath the structure. If the structure is elevated or slab-on-grade construction, the sample will be collected from the upgradient side of the structure.
 - Soil sample beneath the vegetation drip line. If residue was observed on vegetation, a sample may be collected from the soil beneath the overhanging vegetation.
 - Soil sample from any soil stained area observed.
 - Soil sample from yellow grass.

- Collect representative soil samples (0 to 2 feet BGS) for inspection and characterization of the soil types and stratigraphy from the soil borings. Soil samples will be field-screened for organic vapors using a portable photo-ionization detector (PID).
- Mark each soil boring location with a flag and document the global positioning satellite (GPS) location.
- Submit a sample from each soil boring to SGS Accutest (Accutest) of Scott, Louisiana for analyses for aliphatics / aromatics in the appropriate carbon ranges by the Massachusetts Department of Environmental Protection (MADEP) Extractable Petroleum Hydrocarbons (EPH) Method.
- Each soil boring will be plugged and abandoned with new top soil upon completion of the sampling.
- Characterize and dispose of the investigation derived waste (IDW) generated during the installation and sampling of the soil borings.
- Prepare and submit a RECAP Evaluation Report to the LDEQ documenting the field and laboratory results and findings and conclusions of the site investigation activities, including the development of Limiting RECAP Standards (LRS) for a non-industrial scenario.

QA/QC samples will be collected and submitted for laboratory analyses for the appropriate parameters. For soil samples, QA/QC blanks will include at a minimum: one field blank per day, one equipment rinsate sample per 20 field samples, one field duplicate sample per 20 samples, and one matrix spike/matrix spike duplicate sample per 20 samples.

3.0 SCHEDULE

PPM is prepared to implement the above scope of work upon receipt of written approval of this workplan. The field activities are expected to take approximately one-half (0.5) day for each residential lot to complete. Upon LDEQ approval of this workplan, PPM will schedule the field work, and advise the LDEQ Team Leader of the anticipated project start date.

Mr. Gary Fulton
Louisiana Department of Environmental Quality
September 8, 2016
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Should you have any questions or require additional information, please do not hesitate to contact either of the undersigned at (225) 293-7270.

Sincerely,
PPM Consultants, Inc.

A handwritten signature in blue ink, appearing to read "Michael D. Lockett".

Michael D. Lockett, P.E.
Senior Engineer

A handwritten signature in blue ink, appearing to read "Thomas B. Powers".

Thomas B. (Tim) Powers, P.G.
Principal

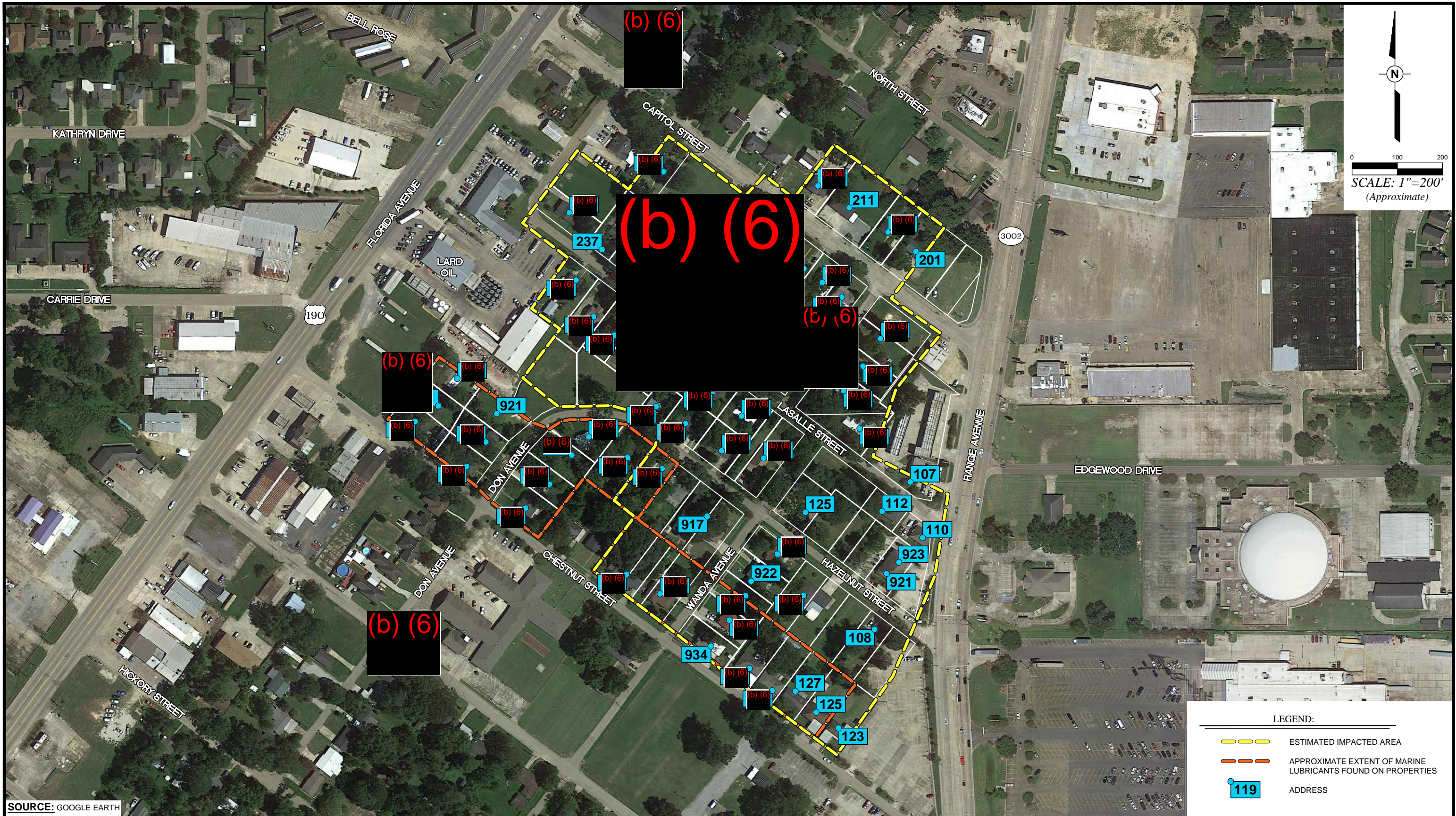
Attachments: Attachment A – Figures
Attachment B – Access Agreements

cc: Mr. Bill Schramm, LDEQ
Ms. Celeste Bonnacaze, LDEQ
Mr. Tim Poche, Taylor Porter
Mr. Tommy Gildersleeve, Taylor Porter

ATTACHMENTS

ATTACHMENT A – FIGURES

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PPM PPM CONSULTANTS, INC. www.ppmco.com	
DRAWN BY: BWH	DRAWN DATE: 09/02/16
PROJECT NUMBER: 542321	BILLING GROUP: ER

LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
914 FLORIDA AVENUE
DENHAM SPRINGS, LOUISIANA

SITE MAP

FIGURE
NUMBER
2

ATTACHMENT B – ACCESS AGREEMENTS

ACCESS AGREEMENTS

Street Name	Physical Address	Homeowner	Access Agreement PPM (date)
(b) (6)	(b) (6)	(b) (6)	
Capitol Street	201	Purvis Credit, Inc.	8/29/2016
	(b) (6)	Conrad Scales, LLC Professional Scales	
	(b) (6)	(b) (6)	
			8/27/2016
	211	Hutchinson, Barry & Rhonda Denham Finance, Inc.	8/26/2016
	(b) (6)		8/23/2016
	(b) (6)		8/25/2016
	(b) (6)		8/30/2016
Chestnut Street			8/22/2016
	123	First United Pentecostal Church of Denham Springs, Inc Tharp, Travis	8/21/2016
	125	First United Pentecostal Church of Denham Springs, Inc Tharp, Travis	8/21/2016
	127	First United Pentecostal Church of Denham Springs, Inc	8/27/2016
	(b) (6)	(b) (6)	8/26/2016
	(b) (6)	(b) (6)	8/24/2016
Don Avenue			DENIED
			DENIED
		John Drive, LLC	8/24/2016
	921	Central Properties	
Hazelnut	(b) (6)	(b) (6)	8/30/2016
			8/27/2016
	108	Charlet Property Group, Inc. Trosclair, Amanda and/or Charlet, Brent	8/22/2016
	(b) (6)		8/29/2016
	125	Andrews, Shelby Carnahan	8/20/2016
	(b) (6)	(b) (6)	8/22/2016
	(b) (6)	(b) (6)	8/21/2016
	(b) (6)	(b) (6)	8/26/2016
			8/23/2016
			DENIED 8/19/16
			8/25/2016
			8/22/2016

ACCESS AGREEMENTS

Street Name	Physical Address	Homeowner	Access Agreement PPM (date)
LaSalle	107	Avis/Budget Daniel Tran	8/26/2016
	110	110 Lasalle, LLC Carnahan Andrews, Shelby	8/20/2016
	112	112 Lasalle, LLC	
	(b) (6)	(b) (6)	8/25/2016
		Magnolia Contractors, Inc. (b) (6) Lease-call owner	8/24/2016
		(b) (6)	8/21/2016
			8/20/2016
			8/20/2016
			8/20/2016
			8/20/2016
			8/20/2016
			8/20/2016
			DENIED 8/20/16
			DENIED 8/22/16
			8/22/2016
Richland			8/20/2016 (signed by (b) (6))
			8/20/2016
			DENIED 8/27/16
	237	4AJ's, LLC	8/22/2016
	(b) (6)	(b) (6)	DENIED 8/27/16
	(b) (6)	BC Property Group, Inc. (b) (6) (b) (6)	8/24/2016
		RBH Properties, LLC	8/21/2016
		(b) (6)	8/24/2016
(b) (6)			8/23/2016
			8/23/2016
			8/24/2016
South Range	921	Southern Eye Center Dr. Roger Shaw	8/24/2016
	923	State Bank & Trust Dr. Roger Shaw	8/24/2016
Wanda Ave	(b) (6)	(b) (6)	DENIED 8/20/16
	917	917 Wanda, LLC - Andrews, Shelby	8/20/2016
	(b) (6)	(b) (6)	DENIED 8/25/16
	922	Two Blessed Sons, LLC	8/26/2016
	(b) (6)	(b) (6)	8/25/2016
	934	First United Pentecostal Church of Denham Springs, Inc.	DENIED 8/25/16
			8/29/2016